

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

<b>In re:</b>  <b>HIGHLAND CAPITAL MANAGEMENT, L.P.,</b>  <b>Debtor.</b>	§ § § § §	<b>Case No. 19-34054-sgj11</b>
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<b>THE CHARITABLE DAF FUND, L.P. and CLO HOLDCO, LTD.,</b>  <b>Appellants,</b>  <b>v.</b>  <b>HIGHLAND CAPITAL MANAGEMENT, L.P.,</b>  <b>Appellee.</b>	§ § § § § § § § § § §	<b>Case No. 3:21-cv-03129-B</b>
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<b>CHARITABLE DAF FUND, L.P. and CLO HOLDCO, LTD.,</b>  <b>Appellants,</b>  <b>v.</b>  <b>HIGHLAND CAPITAL MANAGEMENT, L.P., HIGHLAND HCF ADVISOR, LTD., and HIGHLAND CLO FUNDING, LTD., nominally,</b>  <b>Appellees.</b>	§ § § § § § § § § § §
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**APPELLANT’S UNOPPOSED MOTION  
FOR EXTENSION OF TIME TO FILE REPLY BRIEF**

Appellants Charitable DAF Fund, L.P. and CLO Holdco, Ltd. move this Court for an extension of time in which to file their reply brief in this appeal of the Bankruptcy Court’s Order Granting Motion to Dismiss the Adversary Proceeding.

## **BACKGROUND**

1. Appellant's filed their opening brief on May 26, 2022. Appellee filed its brief on June 27, 2022.

2. Appellant's reply brief is currently due on July 11, 2022.

## **REASONS FOR EXTENSION**

3. Appellants respectfully request an 18-day extension to and including July 29, 2022, at 5:00 p.m. by which to file their reply brief for the following reasons and commitments:

- A long-planned, extended family vacation from July 6 through 24, 2022.
- Daily depositions in two cases from June 21 through July 1, including time devoted prior thereto for extensive preparation.
- Reply brief deadline today in *The Charitable DAF Fund, L.P. v. Highland Capital Management, L.P.*, Adversary Proceeding No. 22-03052-sgj, In the United States Bankruptcy Court for the Northern District of Texas, Dallas Division.

## **CONCLUSION**

For the above reasons, Appellants respectfully request that their request for an 18-day extension to and including July 29, 2022, at 5:00 p.m. be granted. Appellants request any and all further relief to which they may be entitled.

Dated: July 6, 2022

Respectfully submitted,

**SBAITI & COMPANY PLLC**

/s/ Mazin A. Sbaiti

**Mazin A. Sbaiti**

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**Counsel for Appellants**

**CERTIFICATE OF CONFERENCE**

I hereby certify that on June 30, 2022, I conferred with counsel for Appellee, who stated that Appellee is not opposed to an 18-day extension of Appellants' reply brief deadline to July 29, 2022.

/s/ Mazin A. Sbaiti

Mazin A. Sbaiti